

**EXHIBIT D-1**

**Morgan Litigation Status Report, Dated May 10, 2002**

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COMMONWEALTH OF MASSACHUSETTS  
APPEALS COURT

JOHN MORGAN, ET AL.,	:	
Appellants,	:	
	:	
v.	:	C.A. NO. 99-P-1965
	:	
W.R. GRACE, INC., ET AL.,	:	
Appellees.	:	

**STATUS REPORT**

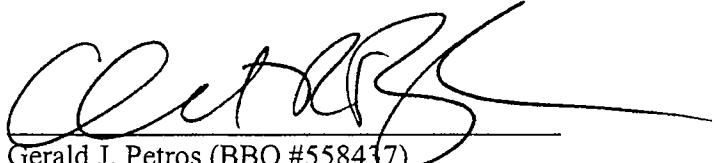
On April 28, 2001, appellee W.R. Grace & Co.—Conn. filed a Suggestion of Bankruptcy in this action notifying the Court that the United States Bankruptcy Court for the District of Delaware entered an Order for Relief under Title 11 of Chapter 11 of the United States Code. Pursuant to 11 U.S.C. § 362(a), the Debtors' filing of their respective voluntary petitions operates as a stay of judicial proceedings against the debtors, including appellee W.R. Grace & Co.—Conn. By Orders dated May 8, 2001, June 11, 2001, July 16, 2001, August 16, 2001, October 17, 2001, November 16, 2001, and February 12, 2002, this Court stayed these proceedings.

In accordance with this Court's February 12, 2002, Order, appellee W.R. Grace & Co.—Conn. files this status report and notifies this Court that the stay of judicial proceedings against the debtors in question, including W.R. Grace & Co.—Conn., in place pursuant to 11 U.S.C. § 362(a), remains in full force and effect. The Bankruptcy Court has, however, set a Bar Date of March 31, 2003, for most general unsecured claims. In light of the fact that the bankruptcy proceedings are not likely to be resolved in the near future, W.R. Grace & Co.—Conn. once

again requests that this Court order that any future status reports be filed in ninety (90) day intervals.

Respectfully submitted,

W.R. GRACE & CO. – CONN.  
By its attorneys,

A handwritten signature in black ink, appearing to read 'Gerald J. Petros', is written over a horizontal line.

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DATED: May 10, 2002

CERTIFICATION

To:

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I certify that I mailed a copy of the within Status Report to counsel of record, as above,  
on May 10<sup>TH</sup>, 2002.

*Diana M. Falcon*